# IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re: § Chapter 11

GLOBAL EAGLE ENTERTAINMENT § Case No. 20-11835 (JTD) INC., et al., 1

§ Jointly Administered

Debtors. § Jointly Administe

## NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

**PLEASE TAKE NOTICE** that request is made by counsel for creditor Broadcast Music, Inc. ("<u>BMI</u>") in the above-captioned cases in accordance with 11 U.S.C. § 1109(b) and Fed. R. Bankr. P. 2002 and 9010(b) (the "<u>Rules</u>") that all notices given or required to be given in this case, all papers, pleadings, motions and applications served or required to be served in the above-captioned cases, be given and served upon the following:

#### **GIBBONS P.C.**

Attn: Mark B. Conlan, Esq. One Gateway Center Newark, NJ 07102-5310 Telephone: (973) 596-4500 Facsimile: (973) 596-0545

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#### **GIBBONS P.C.**

Attn: Howard A. Cohen, Esq. 300 Delaware Avenue, Ste 1015 Wilmington, DE 19701-1671 Telephone: (302) 518-6300 Facsimile: (302) 429-6294

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**PLEASE TAKE FURTHER NOTICE** that the foregoing request includes not only the notices and papers referred to in the Rules specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand,

<sup>&</sup>lt;sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number are: Global Eagle Entertainment Inc. (7800), Airline Media Productions, Inc. (2314), Emerging Markets Communications, LLC (0735), Entertainment in Motion, Inc. (3908), Global Eagle Entertainment Operations Solutions, Inc. (3375), Global Eagle Services, LLC (7899), Global Eagle Telecom Licensing Subsidiary LLC (2547), IFE Services (USA), Inc. (2120), Inflight Productions USA Inc. (8493), Maritime Telecommunications Network, Inc. (9974), MTN Government Services, Inc. (6069), MTN International, Inc. (8559), MTN License Corp. (0314), N44HQ, LLC (0570), Post Modern Edit, Inc. (6256), Row 44, Inc. (2959), and The Lab Aero, Inc. (9831). The Debtors' address is 6080 Center Drive, Suite 1200, Los Angeles, California 90045...

and any answering or reply papers filed in the above-captioned cases or in any associated case or adversary proceeding.

PLEASE TAKE FURTHER NOTICE that neither this notice nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive BMI's rights: (i) to have final orders in non-core matters, as well as statutory core matters in which the court lacks the Constitutional authority to enter a final order absent the consent of the parties, entered only after de novo review by a district court judge; (ii) to trial by jury in any proceedings so triable herein or in any case, controversy or proceeding related hereto; and (iii) to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or any other rights, claims, actions, defenses, setoffs or recoupments to which BMI is and/or may be entitled under agreements, at law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance does not constitute an agreement to accept service of initial process under Fed. R. Civ. P. Rule 4 or Fed. R. Bankr. P. Rule 7004, nor shall it result in undersigned counsel being deemed to be the agent of BMI for such purpose.

PLEASE TAKE FURTHER NOTICE that this appearance and request for notice is made without prejudice to BMI's rights, remedies and claims against other entities. All rights, remedies and claims are hereby expressly reserved.

Dated: September 9, 2020

Wilmington, DE

### **GIBBONS P.C.**

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